## IN THE UNITED STATES DISTRICT COURT WESTERN DISTRICT OF TEXAS EL PASO DIVISION

JESUS PARRA,	§	
Plaintiff,	§	
	§	
V.	§	
	§	
FEDEX FREIGHT SERVICES, INC.,	§	CIVIL ACTION NO: 3:14-CV-00459
a/k/a FEDEX CORPORATE	§	
SERVICES,	§	
INC., a/k/a FEDEX CORPORATION,	§	
Defendant.		

## DEFENDANT'S DISCLOSURE STATEMENT

COMES NOW FedEx Freight Services, Inc., a/k/a FedEx Corporate Services, Inc., a/k/a FedEx Corporation, Defendant, in the above-styled and numbered cause and in accordance with Federal Rule of Civil Procedure 7.1 and would respectfully show the following:

Defendant FedEx Freight Services, Inc. is not a correctly named Defendant. FedEx Freight Services, Inc. and FedEx Corporate Services do not exist. To the extent Plaintiff intended to name FedEx Corporation as a Defendant, FedEx Corporation is a Delaware corporation with its principal place of business in Memphis, Tennessee.

However, Defendant maintains that the proper party to this action is FedEx Freight, Inc. as Plaintiff was employed by FedEx Freight Inc. at all relevant times. FedEx Freight, Inc. is now, and was at all material times, a corporation incorporated under the laws of the State of Arkansas. FedEx Freight, Inc.'s principal place of business is located at 2200 Forward Drive, Harrison, Arkansas. FedEx Freight, Inc. is now, and was at all material times, a wholly-owned subsidiary of FedEx Freight Corporation, a corporation incorporated under the laws of the State of Delaware. FedEx Freight Corporation's principal place of business is located at 1715 Aaron Brenner Drive, Memphis, Tennessee.

FedEx Freight Corporation is a wholly-owned subsidiary of the FedEx Corporation, a publicly-held corporation organized and incorporated under the laws of the State of Delaware. FedEx Corporation's principal place of business is located at 942 South Shady Grove Road, Memphis, Tennessee. FedEx Corporation's corporate functions are centrally managed from its headquarters in Memphis, Tennessee.

Respectfully submitted,

## **DESHAZO & NESBITT, LLP**

By: Scott F. DeShazo Scott F. DeShazo State Bar No. 24011414 sdeshazo@dnaustin.com Thomas A. Nesbitt State Bar No. 24007738 tnesbitt@dnaustin.com Rachel Noffke State Bar No. 24007754 rnoffke@dnaustin.com DESHAZO & NESBITT, LLP 809 West Avenue Austin, Texas 78701 (512) 617-5560 - Telephone (512) 617-5563 - Facsimile **COUNSEL FOR DEFENDANT** FEDEX FREIGHT SERVICES, INC. a/k/a FEDEX CORPORATE SERVICES, INC. a/k/a FEDEX CORPORATION

## **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of this document was served on the following known Filing Users through the NEF, on this 16<sup>th</sup> day of December, 2014:

Soraya Yanar Hanshew The Hanshew Law Firm, PLLC 632 Moondale Dr. El Paso, Texas 79912 Fax: (915) 996-9907

> /s/ Scott F. DeShazo Scott F. DeShazo